

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

NETJETS ASSOCIATION OF SHARED  
AIRCRAFT PILOTS,

Plaintiff,

vs.

NETJETS AVIATION, INC., et al.

Defendant.

Case No.: 2:14-cv-02487

Judge Watson

Magistrate Judge King

**JOINT MOTION FOR ENTRY OF AGREED ORDER ESTABLISHING PROTOCOL  
FOR PRODUCTION OF ELECTRONICALLY STORED INFORMATION**

Fed. R. Civ. P. 26(f)(3)(C) required the parties during their Rule 26(f) conference to discuss issues about disclosure or discovery of electronically stored information, including the form or forms in which it should be produced. Following their Rule 26(f) conference, the parties met and conferred to outline a protocol for production of electronically stored information in this matter. The results of that negotiation were memorialized in the attached Agreed Order Establishing Protocol for Production of Electronically Stored Information. This Order will enable discovery to proceed more smoothly and more efficiently, and will eliminate uncertainty in the expectations of the parties concerning production of electronically stored information.

Accordingly, and pursuant to Rule 26, the parties jointly request the Court enter the attached Agreed Order Establishing Protocol for Production of Electronically Stored Information.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing was filed electronically with the Clerk of Court using the CM/ECF system and to be thereby served electronically upon the following counsel of record this 21st day of April, 2015:

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